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12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,) Case No. 2:22-cr-00168-JAM
17 Plaintiff,)
18 vs.) **STIPULATION REGARDING
19 CHRISTIAN FLORES,) EXCLUDABLE TIME PERIODS UNDER
20 Defendant.**) SPEEDY TRIAL ACT; ORDER
21) Date: July 25, 2023
22) Time: 9:00 a.m.
23) Court: Hon. John A. Mendez
24)
25)
26)
27)
28)

29 STIPULATION

- 30 1. By previous order, this matter was set for a status conference on July 25, 2023.
31 2. By this stipulation, Defendant Christian Flores now moves to continue the status
32 conference until **September 26, 2023, at 09:00 a.m.**, and to exclude time between July
33 25, 2023 and September 26, 2023 under Local Code T4.
34 3. The parties agree and stipulate, and request that the Court find the following:
35 a) The government has represented that the discovery associated with this case has been
36 produced to counsel, and has made supplemental discovery available for defense
37 counsel's review.
38 b) Counsel for defendant desires additional time to review the discovery with her client,
39 consult with her client, conduct defense investigation, discuss plea agreements, and
40 otherwise prepare for trial.
41 c) Counsel for Mr. Flores believe the failure to grant the above-requested continuance

would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

- 3 d) The government does not object to the continuance.
- 4 e) Based on the above-stated findings, the ends of justice served by continuing the case
5 as requested outweigh the interest of the public and Mr. Flores in a trial within the
6 original date prescribed by the Speedy Trial Act.
- 7 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
8 seq., within which trial must commence, the time period of May 9, 2023 to July 25,
9 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)
10 [Local Code T4] because it results from a continuance granted by the Court at
11 defendant's request on the basis of the Court's finding that the ends of justice served
12 by taking such action outweigh the best interest of the public and the defendant in a
13 speedy trial.

14

15 Dated: July 19, 2023

HEATHER E. WILLIAMS
Federal Defender

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17 _____
18 /s/ *Meghan McLoughlin*
19 MEGHAN MCLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
CHRISTIAN FLORES

20 Dated: July 19, 2023

21 _____
22 /s/ *Justin L. Lee*
23 JUSTIN L. LEE
Assistant United States Attorney

ORDER

24 IT IS SO ORDERED.

25 Dated: July 19, 2023

26 _____
27 /s/ John A. Mendez
28 THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE